

EXHIBIT D

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Privacy Policy

Privacy Policy

The Economist Group's Privacy Policy

The Economist Group strives for transparency and trust when it comes to protecting your privacy and we aim to clearly explain how we collect and process your information. It's important to us that you should enjoy using our products, services and website(s) without compromising your privacy in any way. This policy outlines how we collect and use different types of personal and behavioural information, and the reasons for doing so. You have the right to access, change or delete your personal information at any time and you can find out more about this and your rights in our FAQ section. Alternatively, you can get in touch directly with our Data Privacy Team; their details included in our "Contact Us" section.

The Economist Group is made up of several companies and this policy applies to all companies within the group. You can view some of our companies in the section below called 'Who we are'.

You should read this policy in conjunction with our [Cookies policy](#) and [Terms of Use](#) and ensure that you understand how we collect and use your information.

Our policies will be updated from time-to-time. Please refer back regularly to keep yourself updated.

Sections in this policy:

- Information we collect
- How we use your information
- How we work with third parties
- Retaining and storing your information
- External links and Cookies
- California Consumer Privacy Act
- Contact Us
- Who we are
- FAQs

This policy applies to "users" and "customers" (or "you") of The Economist Group; that is anyone ordering, registering or interacting with any product or service from any of The Economist Group businesses. This includes event attendees, subscribers, registrants, website users, app users etc.

Collection and use of your information

The information you provide us, and that which we gather based on your activity, helps us to deliver more relevant content as well as create a more seamless experience across the products and channels through which you may access that content.

We collect and store some information about you in order to deliver products and services to you (such as your subscription, or so that you can attend an Economist Event). We share some of that information with trusted suppliers (including payment providers and postal services) to ensure the delivery of those products and services, or to give personalised recommendations on things we think will be of interest to you. We also collect information when you use our products and services and further details are provided below.

Information we collect

Information you provide us which we need in order to provide you with our services and products

There is certain personal information that we need in order to provide the products and services that you have chosen. Examples of details we collect in order to fulfil a subscription to The Economist include:

- Name
- Postal address (including postcode)
- Email address
- Payment details

In addition to the above, examples of the details we collect for our Economist Events business and The Economist Intelligence Unit (“EIU”) could include:

- Job title
- Work email
- Company
- Country
- Industry

Other parts of The Economist Group may ask for different information such as phone numbers, gender or date of birth, as indicated when you interact with those products or services.

Information we collect through your use of our products

When you use any of our online platforms or apps we collect information that helps us to deliver the service you have chosen and to improve your experience. This is done through cookies and other technologies. Examples of the type of information we may collect are:

- Browser
- Email Provider
- The pages you read on our websites and how you got to them



- Device
- IP address
- Internet Connection
- Location (in some cases)

You can also volunteer to disclose additional information which may not be essential for us to deliver a service to you. By providing it you help us to ensure we communicate with you in a way that's most relevant, useful and engaging for you. We may collect and ask for additional information when you order, purchase, register, subscribe or make use of our products or services in any way, for example in person, via our marketing campaigns, via phone or mail orders, or our websites.

Information we receive from third parties

We occasionally work with third parties who provide additional information that you have shared with them, such as your telephone number and postal address (for example if you've moved house or updated your phone number and we need to contact you with important service information). Some third parties may also share further information about your interaction on our sites to help us personalise our services to you. More information can be found in the Audience Profiling section below.

Information we do not track

We do not track or collect any sensitive information about you. This includes race, religion, ethnicity, and political opinion.

How we use your information

We primarily use your information for the purpose of delivering the products and services that you have chosen and to personalise our interactions (including advertising) with you. For further details about this, and other ways we may use your information, please read the sections below.

To provide products and services

- To fulfil your orders and contracts with us (across all our products and services including The Economist, 1843, Learning.ly, The Economist E-store, GMAT Tutor, The Economist Intelligence Unit ("EIU") subscriptions, The Economist Events, Signal Noise, Bazian, Eurofinance and Commercial Payments International) this includes our third party specialised payment providers.
- To manage your access to our online content and apps, and to send you content via push notifications, newsletters, EIU subscriptions if you have requested us to do so.
- To send you service notifications related to your product or service such as subscription renewal notifications, password resets and order confirmations.
- To manage customer service queries and complaints.
- To manage your privacy preferences and to ensure you only receive communications that you have requested, which may include using your details to suppress you from communications.
- To send you administrative emails about your account, reminders for upcoming events, service changes, or new policies. These updates, changes and notifications are essential for the services that

you have selected.

- To provide general location-based services (e.g. the region or country you are in), advertising or search results for our content.
- To detect and reduce fraud including fraudulent orders.
- To prevent users from posting illegal, offensive or objectionable comments on our site.
- To run competitions, prize draws and promotions or if you agree to be a speaker or contributor at, or in, one of our events, projects or films. In these cases, subject to any specific terms The Economist Group agrees with you separately, you grant a global right to The Economist Group to use your name, picture, likeness, voice, biographical information and statements, for advertising, trade, publicity and promotional purposes in all media now known or discovered afterwards and on the internet.

To deliver marketing and advertising

We need your consent to use your information for some specific purposes such as marketing, brand response communications and personalised advertising. Ways in which we will use your information if you consent are as follows:

We may send marketing communications via a range of channels including email and push notifications and you can opt out of these at any time. If you give us marketing permission, we may contact you to tell you about special offers and related or similar products or services within The Economist Group. We may pass your information to specially selected third parties who would like to contact you with information regarding their own products and services such as other subscriptions, events or content services. Those parties are responsible for their use of your data and you should read their privacy policies carefully. For more information on how we work with third parties please see the section below. We will ask you if you wish to opt-out of such marketing when you first sign up to receive our products or services. You can also update your preferences for your Economist subscription at any time via your online account at economist.com or by contacting customer services (see 'Contact us'). You can also opt out of email marketing by clicking the unsubscribe link at the bottom of our emails. Other parts of The Economist Group will inform you of how to opt out of such marketing communications, or you can contact us. This does not apply to important service notifications such as payment confirmations (as covered in the section above) or where we have some other legal basis for contacting you. In order to deliver advertising and marketing messages that are relevant to you, we may use the information we hold about you, including details that we collate from your use of our services or third parties, such as more precise information on your location or your company's profile (ie. company name, company size), to ensure that the advertising you see is of interest to you.

Other uses of your information

Other than where we have asked for your consent, we mainly rely on two other separate bases to lawfully use your information. First, we need to use your information in certain ways to provide our products or services to you, in accordance with our contract(s) with you. In this case, it is necessary for us to use your information so that we can deliver the products or services you have chosen. Second, as described in more detail below, in certain cases, we may use your information where necessary to further our legitimate interests, where those legitimate interests are not overridden by your rights or interests, including:

To measure customer and user response and engagement with our products and services such as online content, email newsletters and subscription offers. This may include sharing your information with third parties who help us to analyse and measure these things.

To ensure our products (including websites and apps) are compatible with the browsers and operating systems used by most of our visitors.

To help us improve our customer and user experience and to support new product development. We may send customer satisfaction surveys and market research questionnaires (for which we may share your information with third party suppliers employed by us).

To create audience profiles for personalised advertising, marketing or research and development on and off our websites – See Audience Profiling and Social Media sections below for more detailed information.

To detect and reduce fraudulent activity and for other security related purposes such as to help us protect against harassment, IP infringement, crime or other security issues.

For any purpose required by law or regulation and to verify information that we provide to third parties for compliance and audit purposes such as the Audit Bureau of Circulation (ABC). We may share your personal data with a third-party auditing organisation such as ABC so they can verify aggregated statistics about circulation and usage of our products or review our policies, processes and procedures for compliance with relevant standards. You can view their privacy policy by following this link.

You have the right to object to any of the above uses of your information, please contact us if you wish to do so. We will consider all objections reasonably, but there may be legal reasons where we deem that the use of your information is still appropriate. We will explain our decision to you in a timely manner.

Social media

The Economist Group publishes content on social media platforms e.g. Twitter, Facebook, LinkedIn through both "organic" and "paid" methods to reach current and potential readers:

"Organic" methods describe where content and/or offers are published onto a social platform so that they may appear in your social platform's content, without being promoted or forced to appear more prominently, e.g. The Economist's Facebook Page.

"Paid" methods describe where content and/or offers are published onto a social platform so that they will appear more prominently, or be shown to users that do not currently follow The Economist Group social pages e.g. a promoted tweet on your Twitter Timeline.

We may place one or more social media platform "tags" on our website in order to better understand how The Economist Group may be of best value to you by providing you with the most relevant content available according to what you have chosen to read on our own websites. These tags only record information around events to help us understand if you are registered or subscribed with us, so that we may use your reading preferences to provide more relevant content and/or offers to you, on social media platforms, e.g. removing subscription offers from your feed if you are a current subscriber.

We do not have direct access to your personal data on your social media platforms.

How we use your details for audience profiling

To enable us to personalise the content and advertising you see (including on social media), we may use your interaction and browsing behaviour or preferences (such as how and what you read on our websites and our apps) to create audience profiles. This is to enable content and message personalisation, and in some cases, advertising to be delivered to you or a group of users (an audience) with similar interests to you. This can be done both on our site and on those of third parties. Please see our [Cookie Policy](#) for more information.



We may analyse your individual information to create a profile of your interests and preferences as a part of an audience. These insights are used to help us make marketing decisions so that we can ensure our messages are relevant to you. There are times we may use additional information available from external sources to help us do this effectively (see How we work with third parties section below).

You can choose to opt out of our audience profiling activity if you wish. This does not mean that you will no longer see advertisements, it just means that the advertisements you will see are no longer personalised to your interests. Please contact us to do so.

How we work with third parties

In some instances, we disclose personal information to third parties when it is necessary to deliver a service or product, or to help us improve your experience with us, or when we are required to do so by contract or law. "Third parties" include agents, subcontractors, sponsors and other associated organisations. We have in place contracts to ensure the information remains secure and limited in use, and if we do not have a legitimate business reason to pass on your information, we will ask you to give consent first. Some examples of when we share your information are below:

When you make a payment on any of our sites your payment will be processed by a specialist payment processor to ensure a secure transaction. All payment processors used by The Economist Group are compliant with required security standards. If you have any questions regarding secure transactions, please contact the Data Privacy team by completing our [enquiry form](#) or email dataprivacy@economist.com.

When you log on to your subscription account for the newspaper, a third party provider who specialises in online account management will manage your access, including re-setting your password.

When we send you an email or a push notification, these are delivered by marketing platforms. As part of this service, certain information such as message opens, clicks and formatting are recorded to help deliver the best email experience.

When we test and launch new products, services or offers, we may work with trusted third parties to support us.

We also employ third parties to carry out statistical analyses and conduct surveys on our behalf, to support our advertising and content production efforts respectively

To provide information for auditing purposes by official regulators.

To enhance your profile with non-personal information.

To enable third parties such as advertisers or sponsors to contact you with information about their own products and services that may be of interest – only if you give explicit permission for us to do so.

Third parties who pass information to us

Our subscriptions services sometimes use additional information such as telephone numbers or postcodes from third parties (like list brokers, researchers or telemarketing agents, who have gathered this information lawfully) to help us to contact you with important service updates via phone or post or to help us make marketing decisions. This includes advertising (by ourselves or via advertising partners) to groups of people with particular interests. These third parties may give us access to your personal information, if you have allowed them to do so.

We may also work with third parties to identify individuals who may be interested in our products and services or in some cases our sponsors / advertisers' products and services. These third parties may give us access to your personal information, if you have allowed them to do so. In any communication you receive from us, through these third parties, we make sure to identify ourselves (and them) so that you know who has access to your information.

IMPORTANT: Please note that the collection, use, and disclosure of information by these third parties are described in their own privacy policies, and consequently may differ from that set out in The Economist Group's Privacy Policy. We are not responsible for those third party privacy policies, and you should ensure that you have read and understood all applicable privacy policies before proceeding.

Retaining and storing your information

Retention policy

We securely store your information, and hold it for as long as we need to in order to provide our services and products to you in accordance with (i) applicable law, or (ii) as long as is set out in any relevant contract you have with us.

We review our retention periods for personal information regularly. If you have not interacted with us in any way, we will generally no longer hold your information after 5 years (although this may be shorter for individual businesses (you can confirm by contacting us)). Sometimes we may need to keep it for longer periods such as tax and other financial regulatory reasons, this would typically be 7 years. We would only keep it for longer than this if we are required to by law.

If you request for us to no longer contact you, for example with marketing communications, we will retain the minimum amount of information about you so that we can ensure we remove you from any future communications. Please note that if you ask us to completely remove all information about you, and you subsequently use our products and services at a later date, we will no longer be able to recognise your previous request not to be contacted, which is why we would keep it and suppress it in line with industry standards.

Storing and transferring information internationally

As the internet is a global environment and we work with third parties across the globe, collecting and using your personal information may involve the transfer of this information internationally, including outside of the European Union. By using our products and services, you acknowledge and agree to your personal information being transferred in this way, including to jurisdictions outside the EEA.

We maintain strict policies to ensure all information that is transferred is done so safely and securely.

Keeping your information safe

We take information security seriously and have policies and procedures in place to ensure the information we hold on you remains safe. We limit who has access to your information and ensure that those who do are bound by contracts to keep your information availability restricted and safe.

Individuals under 16

The Economist Group does not intentionally, or knowingly, process personal information from individuals under the age of 16. When necessary, users under the age of 16 will be told not to submit any



The Economist Group does not intentionally, or knowingly, process personal information from individuals under the age of 16. When necessary, users under the age of 16 will be told not to submit any personal details. We will make every effort to delete any details of such users where a parent or guardian has informed us that these details have been collected.

California Consumer Privacy Act (CCPA)

In addition to the rights documented elsewhere in this Privacy Policy, if you are a California Resident you have some additional rights under the CCPA. These include being informed of any of your personal data that has been "sold" (where sold for this purpose is defined below) and to opt out of the future selling of your personal data to third parties.

We may share your details with selected 3rd parties, where you have opted in for us to do so, which is defined as a "sale" of data under the CCPA. If you change your mind you can opt out of the sale of personal data by using this [Do Not Sell My Personal Information](#) link .

To submit requests for information about any of your personal data which we have sold according to the CCPA, you can complete our [enquiry form](#), get in touch with us by any of the methods listed in the Contact Us section of this policy or call this free toll number +1 800 456 6086. If you are emailing us for a request please indicate in the subject that it is a CCPA related request.

For information on the type of data we may collect from consumers and the 3rd parties this may be disclosed to, including our suppliers and other entities within our group, please refer to the relevant sections in this privacy policy.

External links

This privacy policy only applies to The Economist Group's use of data, our websites, services or products may, from time to time, contain links to, use or be on external sites. The Economist Group is not responsible for the privacy policies or the content of such sites and we recommend that you read the privacy policies on any external sites you use. Similarly, if you are directed to our website from a third party we are not responsible for the privacy policy or practices of the third party. We strongly recommend you read their policy.

Cookies

Cookies are small files that are created in your web browser when you visit any of our websites.

You can find more information about the types of cookies that we, and certain third parties use, why we use them, and how to manage them in our [cookie policy here](#).

Who we are

Brands

You can find full details of the brands which make up The Economist Group here. We have also list some brand names below.



Group companies

There are a number of companies which make up The Economist Group. In accordance with the UK Data Protection Act 2018, the following members of The Economist Group are registered with the United Kingdom's Information Commissioner's Office as a data controller:

Data controller: The Economist Newspaper Limited

Registered Office: The Adelphi, 1-11 John Adam Street, London, WC2N 6HT, UK

ICO Registered Number: Z7134617

Company Registration Number: 236383

Other names and brands include: The Economist, 1843, Commercial Payments International, Economist Careers, Economist Jobs, Economist.com, Economist Events, Economist Films, Espresso, E-Store, Learningly, Signal Noise, The World In, Economist Debates

Data controller: The Economist Intelligence Unit Limited

Registered Office: The Adelphi, 1-11 John Adam Street, London, WC2N 6HT, UK

ICO Registered Number: Z6982453

Company Registration Number: 1762617

Other names and brands include: EIU, EIU subscriptions, Economist Intelligence Unit, Economist Corporate Network, EIU Healthcare, Bazian, Clearstate

Data controller: EuroFinance Conferences Limited

Registered Office: The Adelphi, 1-11 John Adam Street, London, WC2N 6HT, UK

ICO Registered Number: Z4865712

Company Registration Number: 3015764

Other names and brands include: EuroFinance Intelligence, EuroFinance Training, Corporate Payments International (CPI)

Data Controller: Trustee(s) of the Economist Group UK Pension Plan

ICO Registered Number: Z6970715

Address: The Adelphi 1-11 John Adam Street London WC2N 6HT

Data Controller: Signal & Noise Limited

ICO Registered Number: ZA575716

Company Registration Number: 05842108

Address: The Adelphi 1-11 John Adam Street London WC2N 6HT



Data Controller: Economist Educational Foundation
ICO Registered Number: ZA577879
Company Registration Number: 07927534
Address: The Adelphi 1-11 John Adam Street London WC2N 6HT

Data Controller: The Economist Charitable Trust
ICO Registered Number: ZA586367
Charity Registration Number: 293709
Address: The Adelphi 1-11 John Adam Street London WC2N 6HT

Contact Us

If you have questions about this policy or about your personal information, please complete our [enquiry form](#), or email dataprivacy@economist.com.

Alternatively, please send correspondence to us at the following address:

The Economist Group
Attn: Data Privacy Manager
20 Cabot Square,
London,
E14 4QW
United Kingdom.

If you have any other queries related to your newspaper subscription please contact the customer services centre, by telephone or email for your region here.

For queries related to other parts of The Economist Group please contact:

- info@Bazian.com for Bazian
- hello@digitalnewsagency.com for Digital News Agency
- registrations@eurofinance.com for EuroFinance
- events@economist.com for The Economist Events
- studio@signal-noise.co.uk for Signal Noise
- https://web.archive.org/web/20230401071548/https://www.eiu.com/Support/customer_support.aspx for The Economist Intelligence Unit

Your rights

You also have the right to ask for us to update, delete or stop processing information we hold about you. However, please note that there are circumstances in which complete erasure of your informa



or ceasing to process your information will not be possible for operational, legal and business reasons. This may include if you remain a customer for whom we need to provide services, or if you wish us to no longer contact you for marketing purposes. In this case we may need to retain some of your details securely in order to facilitate this request by, for example, keeping you on a "do not contact" or suppression list. This will be the only purpose for which your data will be used if this is the case. In addition, as a California Resident you have the right to be informed of your information that has been "sold" and to opt out of the sale of personal data. For details on how to action these requests please refer to the California Consumer Privacy Act (CCPA) section above. We do not discriminate against individuals that exercise their data protection or privacy rights.

FAQs

How can I see what information you hold on me?

You can complete our Data Privacy [enquiry form](#) and our data privacy team will process your request.

How do I opt out of profiling?

You can contact us at any time by completing our [enquiry form](#). A member of our Data Privacy team will contact you regarding your request.

How do I opt out of marketing?

You can update your preferences at any time, and for subscribers of The Economist, this can be done via your online account at [economist.com](#), or by contacting customer services (see 'Contact Us'). You can also opt out of email marketing by clicking the unsubscribe link at the bottom of our emails. For other parts of The Economist Group you can contact us by completing our [enquiry form](#).

How do I make a complaint?

If you have a complaint regarding any aspect of your personal information or this privacy policy, please contact the Data Privacy team by completing our [enquiry form](#). If you are still not satisfied with the outcome of your complaint, you may write to the Information Commissioner's Office as set out below.

Can I write to the ICO?

Yes, you can. Contact details are at Information Commissioner's Office.

How long do you hold my information for?

We generally hold information for up to 5 years, after our last interaction with you. It may be 7 years or longer if required for financial, tax or legal reasons.

Can I ask you to delete my information?

Yes, just contact us. We will consider your request and take appropriate action which may mean that we suppress it, rather than delete it to ensure that we can still follow your preferences as to whether or not we can market to you.

How do I update my information?

You can update it at any time via your online account at [economist.com](#) (for subscribers of the newspaper), or contact us.

How do I manage cookies?

You can use our cookie consent tool. For more information please also see our [cookie policy](#).

What are my rights under GDPR?

You have a right to ask us for information we hold about you, "Subject Access Request", so that we can



respond as promptly as possible please complete our [enquiry form](#).

What are my rights under the CCPA?

You have a right to ask us what information we have “sold” about you, where “sold” includes sharing your personal data with selected third parties, when you have given us permission to do so by opting in to marketing.

Changes to this policy

From time to time, we may make changes to the privacy policy. This may be in relation to changes in the law, best practice or changes in our services. These changes will be reflected in this statement, so you should check here regularly.

Last update: 08 July 2020

About us

Our history

Our structure

Our values

Our offices

Businesses

The Economist

Economist Impact

Economist Intelligence

Economist Education

Careers

Careers

Working here

DEI

ESG

Sustainability

Social

Governance

Leadership

Results

Annual & interim results

AGM & shareholder calls

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